

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CITY OF ALMATY, KAZAKHSTAN and
BTA BANK, JSC,

Plaintiffs,

-against-

FELIX SATER, DANIEL RIDLOFF, BAYROCK
GROUP INC., GLOBAL HABITAT SOLUTIONS,
INC., RRMI-DR LLC, FERRARI HOLDINGS
LLC, and MEM ENERGY PARTNERS LLC,

Defendants.
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: Case No. 19-civ-02645
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: **NOTICE OF MOTION**
: **TO DISMISS**
: **AMENDED COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying Declaration of Jill Levi, dated October 11, 2019, in Support of the Motion to Dismiss of Defendants Felix Sater (“Sater”), Daniel Ridloff (“Ridloff”), Bayrock Group Inc., (“Bayrock”), Global Habitat Solutions, Inc. (“GHS”) and RRMI-DR LLC (“RRMI”) (collectively, the “Moving Defendants”), and the Exhibit annexed thereto, and the Memorandum of Law in Support of the Moving Defendants’ Motion to Dismiss the Amended Complaint, dated October 11, 2019, the Moving Defendants, by their undersigned attorneys, Todd & Levi, LLP, will move this Court before the Honorable Alison J. Nathan, at the Courthouse, 40 Foley Square, New York, New York, 10007, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the First Amended Complaint dated August 30, 2019 against the Moving Defendants and granting such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the agreed upon briefing schedule, Plaintiffs are required to submit opposition, if any, to the Motion on or before November 12, 2019, and the Moving Defendants shall submit a reply to such opposition, if any, on or before December 3, 2019.

Dated: New York, New York
October 11, 2019

TODD & LEVI, LLP

By: s/Jill Levi
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